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**From:** Culleen, Lawrence E. [Lawrence.Culleen@arnoldporter.com]  
**Sent:** 9/19/2019 7:21:40 PM  
**To:** Dekleva, Lynn [dekleva.lynn@epa.gov]  
**Subject:** in advance of upcoming (9/27) meeting -- Semiconductor Industry Association  
**Attachments:** Impact of the Semiconductor Industry Semiconductor Industry Association.pdf; SIA\_One\_Pager\_May\_2018.pdf; EPA meeting March 2019.pdf; AA Dunn meeting request sept 2019.docx; EPA.docx

Lynn --

I understand you might be joining us for a meeting in which I will participate next Friday (September 27<sup>th</sup>) during which the Semiconductor Industry Association hopes to ensure alignment with the OCSPP front office and the path we are on currently for the use of various Consent Orders to regulate new chemical photoacid generating (PAG) substances. It will be good to see you if you plan to attend; the subject matter concerns the Section 5 program, and a category of new chemical substances which are important to the US semiconductor industry.

Attached are some basic background materials I shared with Tom Tyler last week and that I am not certain I remembered to share with you. These include information on the semiconductor manufacturing sector, some PPT slides we shared with Alex during an introductory meeting last Spring, and a copy of our meeting request letter.

Also attached is the draft "template" that will be used for Consent Orders that would be issued to each company that has submitted substances within the scope of the category of new chemicals we've been discussing. The Consent Order template includes full terms of the testing program as currently proposed by the Agency. The Orders would trigger testing at finite periods ((time-trigger deadlines) following execution of the Orders.

I received the attached version yesterday for our consideration; we have been requested to provide comments to EPA on the current draft before the end of business Tuesday -- in advance of the date of our meeting with Alex.

Please feel free to contact me for any background you might need or insight into the process through which we've arrived here.

I look forward to seeing you again soon, and perhaps conferring in advance of that meeting. My email and phone coordinates appear below.

Thank you.

Larry

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**From:** Culleen, Lawrence E. <[Lawrence.Culleen@arnoldporter.com](mailto:Lawrence.Culleen@arnoldporter.com)>  
**Sent:** Tuesday, September 10, 2019 5:38 PM

**To:** Tyler, Tom <[Tyler.Tom@epa.gov](mailto:Tyler.Tom@epa.gov)>

**Subject:** RE: Meeting Request -- Semiconductor Industry Association

Tom --

Thank you for speaking with me today. The first two pdfs represent some of the "basic background materials" about the Semiconductor Trade Association. The third pdf includes selected slides from a PPT deck we used during a "get to know" meeting SIA held in March with Alex (this includes a slide showing SIA membership, and some background on the photoacid generator (PAG) PAG Project generally, as well as some of the top-of-the line information concerning the profile and footprint of semiconductor manufacturing facilities in which PAG substances are used. Finally, the members of the "PAG Consortium" are identified in the footnote of the meeting request letter we sent last week (also attached).

We can prepare a proposed agenda for the meeting once we finalize the date.

Your assistance on this and willingness to listen today are much appreciated.

Larry

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**From:** Tyler, Tom <[Tyler.Tom@epa.gov](mailto:Tyler.Tom@epa.gov)>

**Sent:** Monday, September 9, 2019 8:56 PM

**To:** Culleen, Lawrence E. <[Lawrence.Culleen@arnoldporter.com](mailto:Lawrence.Culleen@arnoldporter.com)>

**Subject:** RE: Meeting Request -- Semiconductor Industry Association

External E-mail

Hi, Larry --

Could we talk again tomorrow at 10am? Or 10:30?

Best,  
Tom

**THOMAS LOY TYLER, ESQ. CHIEF OF STAFF**

**OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

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**From:** Culleen, Lawrence E. <[Lawrence.Culleen@arnoldporter.com](mailto:Lawrence.Culleen@arnoldporter.com)>

**Sent:** Friday, September 6, 2019 4:29 PM

**To:** Tyler, Tom <[Tyler.Tom@epa.gov](mailto:Tyler.Tom@epa.gov)>

**Subject:** FW: Meeting Request -- Semiconductor Industry Association

Tom --

Writing to you as a follow-up to my recent voice message. I am hoping I might confer with you to provide the necessary background the put this meeting request into context. I also have some thoughts about how you might consider including among the front office staff you might invite to participate in the meeting.

I look forward to speaking with you again soon.

Larry

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**From:** Cullen, Lawrence E.  
**Sent:** Wednesday, September 4, 2019 7:47 PM  
**To:** Alexandra Dapolito Dunn <[Dunn.alexandra@Epa.gov](mailto:Dunn.alexandra@Epa.gov)>  
**Cc:** Bolen, Derrick <[bolen.derrick@epa.gov](mailto:bolen.derrick@epa.gov)>  
**Subject:** Meeting Request -- Semiconductor Industry Association

Alex --

On behalf of my clients at the Semiconductor Industry Association, I am submitting the attached request for a meeting. We would like to discuss with you the progress made thus far on our discussions with the new chemical program staff concerning certain Photoacid Generator ("PAG") substances (including so-called "onium" compounds). We want to ensure the PAG Consortium's efforts to provide important exposure and environmental fate and effects information to Agency reviewers, and the regulatory approaches being taken, are aligned with your goals for the program.

As with SIA's meeting with you earlier this year, we anticipate that we would have only a limited number of people present representing SIA and the Consortium.

If you concur, I will reach out to Derrick to make the necessary arrangements.

Thanking you in advance -- and hoping I might see you next week in Boston at the ABA/SEER Fall Conference?

Larry

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Partner

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